

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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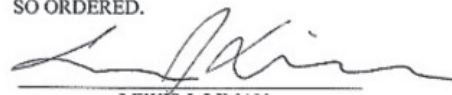
**Via ECF**

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**REQUEST GRANTED.**

The Court approves the temporary return of the passport as proposed and directs Pretrial Services to return to defense counsel Carolina Borges's Brazilian passport.

3/31/2023 SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

**Re: United States v. Raquel Moura Borges  
21 Cr. 172 (LJL)**

Dear Judge Liman,

We write with the consent of the government to respectfully request that the Court order the temporary return of the passport for Ms. Borges's eldest daughter. As part of Ms. Borges's bail package, the defense surrendered to Pretrial Services the passports of her two daughters. In order to obtain an identity card in New York State, where she is now attending college, Ms. Borges's eldest daughter needs to show the Department of Motor Vehicles her original passport at an appointment scheduled on April 5, 2023.

So that she may obtain this identity card (which is not an international travel document), we respectfully request that the Court order Pretrial Services to return to defense counsel Carolina Borges's Brazilian passport, which the defense will surrender to Pretrial Services immediately after the younger Ms. Borges's appointment at the D.M.V. The Court previously granted a similar request when the younger Ms. Borges was studying in North Carolina and needed to obtain an identity document in that state. *See* Doc. 23.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Neil P. Kelly  
Assistant Federal Defender  
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cc: AUSA Andrew Thomas